

1 Scott E. Gizer, Esq., Nevada Bar No. 12216
2 *sgizer@earlysullivan.com*
3 Sophia S. Lau, Esq., Nevada Bar No. 13365
4 *slau@earlysullivan.com*
5 EARLY SULLIVAN WRIGHT
6 GIZER & McRAE LLP
7 8716 Spanish Ridge Avenue, Suite 105
8 Las Vegas, Nevada 89148
9 Telephone: (702) 331-7593
10 Facsimile: (702) 331-1652

11 Kevin S. Sinclair, Nevada Bar Number 12277
12 *ksinclair@sinclairbraun.com*
13 SINCLAIR BRAUN LLP
14 16501 Ventura Boulevard, Suite 400
15 Encino, California 91436
16 Telephone: (213) 429-6100
17 Facsimile: (213) 429-6101

18 Attorneys for Defendant
19 CHICAGO TITLE INSURANCE COMPANY

20 DESIGNATED LOCAL COUNSEL FOR SERVICE OF
21 PROCESS ON SINCLAIR BRAUN LLP PER L.R. IA 11-1(b)

22 Gary L. Compton, State Bar No. 1652
23 2950 E. Flamingo Road, Suite L
24 Las Vegas, Nevada 89121

25 **UNITED STATES DISTRICT COURT**
26 **DISTRICT OF NEVADA**

27 U.S. BANK NATIONAL ASSOCIATION,
28 AS TRUSTEE FOR GREENPOINT
29 MORTGAGE FUNDING TRUST
30 MORTGAGE PASSTHROUGH
31 CERTIFICATES, SERIES 2006-AR6,

32 Plaintiff,

33 vs.

34 FIDELITY NATIONAL TITLE GROUP,
35 INC., et al.,

36 Defendants.

Case No.: 2:21-cv-00273-JAD-NJK

**STIPULATION AND ORDER
EXTENDING DEFENDANT
CHICAGO TITLE INSURANCE
COMPANY'S TIME TO RESPOND
TO RENEWED MOTION FOR
REMAND [ECF No. 31]**

(First Request)

ECF No. 32



1 Defendant Chicago Title Insurance Company (“Chicago Title”) and Plaintiff U.S. Bank
 2 N.A. (“U.S. Bank”) (collectively, the “Parties”), by and through their counsel of record, hereby
 3 stipulate and agree as follows:

- 4 1. On February 18, 2021, U.S. Bank filed its Complaint in the Eighth Judicial District
 5 Court, Case No. A-21-829687-C [ECF No. 1-1];
- 6 2. On February 18, 2021, Chicago Title filed a Petition for Removal to this Court [ECF
 7 No. 1];
- 8 3. On March 22, 2021, U.S. Bank filed a Motion for Remand [ECF No. 9] and Motion
 9 for Costs and Fees [ECF No. 14];
- 10 4. On May 11, 2021, the Court entered an order, pursuant to the Parties’ stipulation,
 11 staying the case pending resolution of *Wells Fargo Bank, N.A. v. Fidelity National*
 12 *Title Ins. Co.* Ninth Cir. Case No. 19-17332 (the “*Wells Fargo II Appeal*”). Upon
 13 entry of the stay the Court terminated all active motions. The Court further ordered
 14 that the Parties move to lift the stay, reopen the case, and reactivate any previously
 15 filed motions within 30 days of issuance of the mandate in the *Wells Fargo II Appeal*
 16 [ECF No. 29];
- 17 5. On December 29, 2021, U.S. Bank filed a Renewed Motion for Remand [ECF No.
 18 31];
- 19 6. Chicago Title’s deadline to respond to U.S. Bank’s Renewed Motion for Remand is
 20 currently January 12, 2022;
- 21 7. Chicago Title’s counsel is requesting an extension until February 14, 2022, to file its
 22 response to the pending Renewed Motion for Remand;
- 23 8. Chicago Title requests a brief extension of time to respond to the Motion for Remand
 24 to afford Chicago Title additional time to respond to the legal arguments set forth in
 25 U.S. Bank’s motion;
- 26 9. U.S. Bank does not oppose the requested extension;
- 27 10. This is the first request for an extension which is made in good faith and not for
 28 purposes of delay;

1 **IT IS SO STIPULATED** that Chicago Title's deadline to respond to U.S. Bank's Motion
2 for Remand [ECF No. 31] is hereby extended through and including February 14, 2022.

3
4 Dated: January 10, 2022

EARLY SULLIVAN WRIGHT
GIZER & McRAE LLP

5
6 By: /s/-- Sophia S. Lau
SCOTT E. GIZER
SOPHIA S. LAU
7 Attorneys for Defendant CHICAGO TITLE
8 INSURANCE COMPANY

9 Dated: January 10, 2022

SINCLAIR BRAUN LLP

10 By: /s/-Kevin S. Sinclair
11 KEVIN S. SINCLAIR
Attorneys for Defendant CHICAGO TITLE
12 INSURANCE COMPANY

13 Dated: January 10, 2022

WRIGHT FINLAY & ZAK, LLP

14 By: /s/-Lindsay D. Dragon
15 LINDSAY D. DRAGON
Attorneys for Plaintiff U.S. BANK
16 NATIONAL ASSOCIATION

17 **IT IS SO ORDERED:**

18
19 Dated: 1-12-2022

20 By: 
UNITED STATES DISTRICT COURT JUDGE